

MEMO ENDORSED

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The application is ☒ granted.
☐ denied.

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Nelson S. Roman, U.S.D.J.

Dated: April 24, 2020 April 22, 2020

White Plains, New York 10601

Honorable Nelson S. Roman
United States District Court Judge
United States Courthouse
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

*Clerk of the Court requested
to terminate the motion (doc. 49).*

Re: *USA v. Lauria, et al*, 19 Cr. 449 (NSR)
Request for Extension of Suppression Motion Schedule

Dear Judge Roman:

I write to the Court on behalf of my client, Brian Rodriguez, to request an extension of the motion schedule previously extended and currently due on April 27, 2020. (ECF Doc No. 40). As the Court is aware, in light of the Covid-19 Pandemic, Chief Judge Colleen McMahon has issued a Standing Order, dated April 20, 2020, suspending all jury trials in this district until further notice¹. Due to my recent and ongoing efforts² to assist many current and former clients with time consuming applications to the Federal Bureau of Prisons, pursuant to 18 USC §3624 and/or by motion to this Court, pursuant to 18 USC §3582(c)(1)(A), I will be unable to file my pretrial suppression motions in a timely manner.

I therefore respectfully an extension of the motion schedule for six weeks so that defense motions would now be due by June 8, 2020. Government response due by June 29, 2020 and ~~my~~ replies due by July 6, 2020.

Co-counsels Samuel Braverman, Esq. (attorney for co-defendant Anthony Lauria) and Jason Ser, Esq. (attorney for co-defendant Anthony Molina) join in this application. AUSA Lindsey Keenan informs me that the Government has no objection.

Thank you, Your Honor, for your attention to this matter.

Very truly yours,

Tanner & Ortega, L.L.P.

Howard E. Tanner
Howard E. Tanner

AUSA Lindsey Keenan (By ECF)
Jason Ser, Esq. (By ECF)
Samuel Braverman, Esq. (By ECF)

¹ See, *In Re: Coronavirus/Covid-19 Pandemic*, 20 MC 197 (CM), ECF Doc No. 1, at 2.

² Such work includes, but is certainly not limited to, consultations with clients and/or family members, drafting of correspondence, submission of orders for inmate medical records which are often voluminous, review of medical and other relevant client records such as pretrial or presentence investigation reports, and legal research. I expect these efforts to continue.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 4/24/2020